

March 29, 2019

VIA ELECTRONIC FILING

Mark L. Johnson
Executive Director and Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive S. W.
P.O. Box 47250
Olympia, Washington 98504-7250

Re: Docket U-180525—Pacific Power & Light Company's Comments

On March 18, 2019, the Washington Utilities and Transportation Commission (Commission) issued a Notice of Request for Additional Information after the March 13, 2019 workshop in the rulemaking to modify consumer protection and meter-related rules as Advance Metering Infrastructure (AMI) technologies are deployed. In response to this notice, Pacific Power & Light Company (Pacific Power), a division of PacifiCorp, submits these written responses to the questions for consideration.

Request No. 1. Investor-owned electric utilities operating in this state have implemented or researched processes and procedures for ensuring that the company does not remotely disconnect certain customers and that it has authorized all remote disconnections of electric service. Please identify and describe those processes and procedures, including but not limited to how they are effective in preventing unauthorized remote disconnects.

Pacific Power does not have remote disconnection capabilities in Washington at this time. However, Pacific Power is providing the following information based on other Pacific Power service areas where the technology is in place. In those states, Pacific Power has several processes in place to mitigate the risk of remotely disconnecting service in error.

Sufficient Prior Notice

Before disconnecting service for nonpayment, all customers receive several mailed disconnection notices. Additionally, customers approaching disconnection will receive six phone calls over the span of three days, or until the customer responds to the calls. If the customer has authorized the company to send emails or texts, the customer will also receive notification through those mediums.

Payment Triggers Automatic Cancellation of Disconnection

When a collection customer makes a payment for the past due amount, the billing system will automatically cancel any pending collection action. This occurs when the payment is made at an automated payment station, online, or over the phone. Payments through these avenues are uploaded into the billing system every 15 minutes, and the customer does not need to call back to notify the company the payment was made to stop any disconnection. The automated payment notification is a safe guard to prevent disconnection of power after a customer has already made a payment.

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Additional Precautions for Medical and Life Support Customers

For qualified medical and life support customers, the ability to remotely disconnect service is disabled. In addition to the aforementioned notification process, all orders to disconnect service are reviewed by the medical team. Several additional attempts to contact the customer are made, and the district manager is contacted by the medical team.

For life support customers, the manager will accompany the collector to the home, and after making contact with residents of the home, the manager will make the final determination of whether the power should be disconnected. If the power is disconnected, it is done by the collector at the residence. The outcome of the meeting with the residents is relayed back to the medical team who will monitor the account and send a request to reconnect service once payment is made by the customer.

While these additional steps are required for disconnection, these meters are enabled for remote reconnection, which allows the company to reconnect service for medical and life support within minutes.

Request No. 2. Other states have addressed how to require or otherwise establish the extent to which data collected from smart meters is sufficiently aggregated to permit usage and disclosure of that data without revealing customer-specific information. Please identify those states and describe the methodologies, definitions, regulations, or requirements each state has adopted.

Pacific Power is not familiar with the requirements of all other states, but provides the following information based on its experience in California.

California Rules and Guidelines Governing Customer Data

California regulators require each investor owned utility to implement tariffs to define processes for the collection and sharing of both customer identifying energy data and for aggregate non customer identifying data. For customer specific energy usage (California Rule 27), the tariffs not only define how the company can use AMI data, but also serves to notify customers on how their data may be used by third-parties. The type of data collected, the purpose of the data collection, required disclosure agreements, and controls for limiting and protecting the data collected by the utility are included in Rule 27. California Rule 28, the tariff for noncustomer identifying data, outlines how to request aggregate data, who can request the data, and the process for releasing the data to third parties. Copies of these tariffs are provided as attachments to these comments.

Data Security and Cybersecurity Measures

In addition, the cybersecurity protocol for Pacific Power's AMI infrastructure meet the standards and guidelines of National Institute of Standards and Technology (NIST). To guard against unwanted access, the company's high-security communication network uses multiple layers of protection including passwords, firewalls, data encryption, continuous monitoring, and other security controls. Ongoing testing and third-party audits of the company's security measures add an extra layer of protection for customer data.

To further guard privacy, customers are assigned a unique, random number that is associated with their usage data. No personal information, such as name, address or account number, is ever transmitted from smart meters.

Customers can access their own energy data by using a secure website requiring a user identifier and a password. The customer must enroll and create an online account. During the enrollment process the customer must provide information matching the account information and validate the enrollment by responding to a text or email. This process is used to validate the identity as the customer when specific AMI data is requested online.

Customer Authorized Data Release

In addition, under the specific circumstances that Pacific Power may release customer specific data or aggregated non-identifying energy consumption there are protections and protocols in place. Any release of data to a third party must coincide with either the customer's signed authorization allowing such a release or a nondisclosure agreement signed by the third party. Third parties include governmental agencies, academic institutions, or other entities contracted by the company to provide services like energy conservation. Information may also be released pursuant to a subpoena as part of a legal action.

Pacific Power appreciates the opportunity to collaborate with staff and stakeholders on these draft rules and looks forward to further discussion on this important topic.

Please contact Ariel Son at (503) 813-5410 if you have any questions.

Sincerely,

_____/s/
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Enclosures

180525-PPL-CA-Rule-27-3-29-19.pdf
180525-PPL-CA-Rule-28-3-29-19.pdf